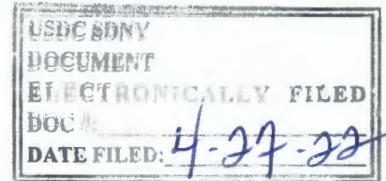


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



IN RE DIDI GLOBAL INC. SECURITIES  
LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

**STIPULATION AND [PROPOSED] ORDER REGARDING TIME TO FILE  
CONSOLIDATED SECOND AMENDED COMPLAINT AND MOTIONS TO DISMISS**

WHEREAS, on October 12, 2021, this Court appointed Cao as Lead Plaintiff and The Rosen Law Firm, P.A. as Lead Counsel for the Class in the above-captioned action;

WHEREAS, on January 7, 2022, Lead Plaintiff filed a consolidated amended complaint (the "CAC");

WHEREAS, on March 7, 2022, Defendants DiDi Global Inc., Goldman Sachs (Asia) L.L.C., Morgan Stanley & Co. LLC, J.P. Morgan Securities LLC, BofA Securities, Inc., Barclays Capital Inc., Citigroup Global Markets Inc., HSBC Securities (USA) Inc., UBS Securities LLC, Mizuho Securities USA LLC, and China Renaissance Securities (US) Inc. filed two motions to dismiss the CAC;

WHEREAS, Lead Plaintiff has reviewed the motions to dismiss and requested Defendants' consent for Lead Plaintiff to file a consolidated second amended complaint (the "CSAC");

WHEREAS, Lead Plaintiff and Defendants have conferred and have agreed to a schedule, subject to the Court's approval, whereby Lead Plaintiff will provide Defendants with a draft of the proposed CSAC, and Defendants will then have seven days to determine whether they consent to the filing of the proposed CSAC. If Defendants consent to filing an amended complaint, the Parties will follow the below schedule for briefing motions to dismiss the CSAC. If Defendants do not

consent, Lead Plaintiff shall file a motion for leave to file an amended complaint within seven days of Defendants advising Lead Counsel that they do not consent to filing the CSAC.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

1. Lead Plaintiff, through Lead Counsel, shall provide to Defendants a copy of the proposed CSAC by April 25, 2022.
2. Defendants shall advise Lead Counsel by May 2, 2022 whether or not they consent to the filing of the CSAC.
3. If Defendants consent to the filing of the CSAC, Lead Plaintiff will file the CSAC within three days of Defendants' notice of consent; Defendants shall file motions to dismiss the amended complaint by ~~June 30~~ <sup>May</sup> 30, 2022; Lead Plaintiff shall file oppositions to the motions to dismiss by ~~August 30~~ <sup>June 30</sup> 30, 2022; and Defendants shall file replies in further support of the motions to dismiss by ~~October 5~~ <sup>July 30</sup> 5, 2022.
4. If Defendants do not consent to the filing of the CSAC, Lead Plaintiff shall file a motion for leave to amend the CAC by May 9, 2022.
5. If Lead Plaintiff files a motion for leave to amend the CAC on May 9, 2022, then Defendants shall file any opposition briefs no later than May 23, 2022, and Lead Plaintiff shall file any reply briefs no later than June 6, 2022.
6. If the Court denies Lead Plaintiff's motion for leave to amend, Lead Plaintiff shall have thirty days from the entry of such order to file briefs opposing Defendants' motions to dismiss the CAC, and Defendants will have thirty days to file any reply briefs.

Respectfully submitted,

Dated: March 31, 2022

/s/ Corey Worcester

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*Lead Counsel for Lead Plaintiff and the Class*

/s/ Jonathan Rosenberg

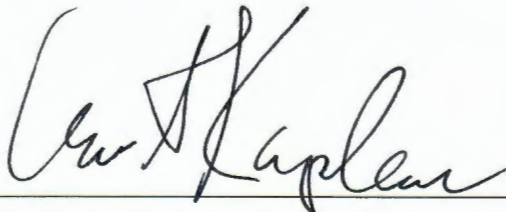
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**SO ORDERED.**

DATED: 4/27/22



Hon. Lewis A. Kaplan, U.S. District Judge



**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that on this 31<sup>st</sup> day of March 2022, this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Laurence Rosen